

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ALBANY**

AL 13 DOE,

Plaintiff,

SUMMONS

-against-

Index No.:

DIOCESE OF ALBANY a/k/a THE ROMAN CATHOLIC DIOCESE OF ALBANY, NEW YORK; ARCHDIOCESE OF NEW YORK; NOTRE DAME-BISHOP GIBBONS HIGH SCHOOL a/k/a NOTRE DAME-BISHOP GIBBONS SCHOOL a/k/a NOTRE DAME-BISHOP GIBBONS MIDDLE AND HIGH SCHOOL; JAMES VINCENT HANNEY a/k/a JAMES A. HANNEY; and DOES 1-5 whose identities are unknown to Plaintiff,

Defendants.

To the above-named Defendants:

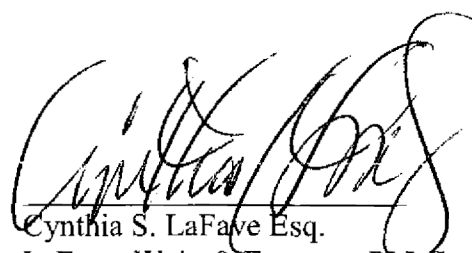
You are summoned and required to serve upon Plaintiff's attorneys, at the address stated below, an Answer to the attached Complaint.

If this Summons was personally served upon you in the State of New York, the Answer must be served within twenty (20) days after such service of the Summons, excluding the date of service. If the Summons was not personally delivered to you within the State of New York, the Answer must be served within thirty (30) days after the service of the Summons is complete as provided by law.

If you do not serve an Answer to the attached Complaint within the applicable time limitation stated above, a judgment may be entered against you, by default, for the relief demanded in the Complaint, without further notice to you.

The action will be heard in the Supreme Court of the State of New York, in and for the County of ALBANY. This action is brought in the County of ALBANY because it is the county in which the DIOCESE OF ALBANY resided when this action was commenced and because it is the county in which a substantial part of the events or omissions giving rise to this claim occurred.

Dated: August 14, 2019

A handwritten signature in black ink, appearing to read 'Cynthia S. LaFave', written over a horizontal line.

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**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ALBANY**

AL 13 DOE,

Plaintiff,

COMPLAINT

-against-

Index No.:

DIOCESE OF ALBANY a/k/a THE ROMAN CATHOLIC DIOCESE OF ALBANY, NEW YORK; ARCHDIOCESE OF NEW YORK; NOTRE DAME-BISHOP GIBBONS HIGH SCHOOL a/k/a NOTRE DAME-BISHOP GIBBONS SCHOOL a/k/a NOTRE DAME-BISHOP GIBBONS MIDDLE AND HIGH SCHOOL; JAMES VINCENT HANNEY a/k/a JAMES A. HANNEY; and DOES 1-5 whose identities are unknown to Plaintiff,

Defendants.

Plaintiff, by and through Plaintiff's attorneys, states and alleges as follows:

PARTIES

1. At all times material to this Complaint, Plaintiff resided in the State of New York.
2. Plaintiff files this complaint under a fictitious name pursuant to Civil Rights Law § 50-b because this case involves a sexual assault.
3. Whenever reference is made to any Defendant entity, such reference includes that entity, its parent companies, subsidiaries, affiliates, predecessors, and successors. In addition, whenever reference is made to any act, deed, or transaction of any entity, the allegation means that the entity engaged in the act, deed, or transaction by or through its officers, directors, agents, employees, or representatives while they were actively engaged in the management, direction, control, or transaction of the entity's business or affairs.

4. Pursuant to §4 of the New York Child Victims Act, Plaintiff is entitled to a trial preference.

5. At all times material, Defendant Diocese of Albany a/k/a The Roman Catholic Diocese of Albany, New York ("Diocese of Albany") was an organization or entity which includes, but is not limited to, civil corporations, decision making entities, officials, and employees, authorized to conduct business and conducting business in the State of New York with its principal place of business at 40 North Main Avenue, Albany, NY 12203.

6. The Diocese of Albany was created in approximately 1847.

7. Later, the Diocese of Albany created a corporation called The Roman Catholic Diocese of Albany, New York to conduct some of its affairs.

8. The Diocese of Albany operates its affairs as both a corporate entity and as the organization known as Diocese of Albany.

9. At all times material, the Diocese of Albany had several programs that seek out the participation of children including, but not limited to, schools and other educational programs.

10. At all times material, the Diocese of Albany, through its officials, had complete control over those activities and programs involving children.

11. At all times material, the Diocese of Albany had the power to appoint each and every person working with children within the Diocese of Albany.

12. At all times material, the Diocese of Albany had the power to train each and every person working with children within the Diocese of Albany.

13. At all times material, the Diocese of Albany had the power to supervise each and every person working with children within the Diocese of Albany.

14. At all times material, the Diocese of Albany had the power to monitor each and every person working with children within the Diocese of Albany.

15. At all times material, the Diocese of Albany had the power to remove each and every person working with children within the Diocese of Albany.

16. At all times material, the Diocese of Albany had the power to terminate each and every person working with children within the Diocese of Albany.

17. At all times material, Defendant Archdiocese of New York was an organization or entity which includes, but is not limited to, civil corporations, decision making entities, officials, and employees, authorized to conduct business and conducting business in the State of New York with its principal place of business at 1011 First Avenue, New York, NY 10022.

18. The Archdiocese of New York was created in approximately 1850.

19. Later, the Archdiocese of New York created a corporation called Archdiocese of New York to conduct some of its affairs.

20. The Archdiocese of New York operates its affairs as both a corporate entity and as the organization known as the Archdiocese of New York.

21. At all times material, the Archdiocese of New York had several programs that seek out the participation of children including, but not limited to, schools and other educational programs.

22. At all times material, the Archdiocese of New York, through its officials, had complete control over those activities and programs involving children.

23. At all times material, the Archdiocese of New York had the power to appoint each and every person working with children within the Archdiocese of New York.

24. At all times material, the Archdiocese of New York had the power to train each and every person working with children within the Archdiocese of New York.

25. At all times material, the Archdiocese of New York had the power to supervise each and every person working with children within the Archdiocese of New York.

26. At all times material, the Archdiocese of New York had the power to monitor each and every person working with children within the Archdiocese of New York.

27. At all times material, the Archdiocese of New York had the power to remove each and every person working with children within the Archdiocese of New York.

28. At all times material, the Archdiocese of New York had the power to terminate each and every person working with children within the Archdiocese of New York.

29. At all times material, Defendant Notre-Dame Bishop Gibbons High School a/k/a Notre Dame-Bishop Gibbons School a/k/a Notre Dame-Bishop Gibbons Middle and High School ("NDBGHS") was an organization authorized to conduct business and conducting business in the State of New York, with its principal place of business at 2600 Albany Street, Schenectady, New York 12304.

30. Defendant NDBGHS includes, but is not limited to, the school corporation and any other organizations and/or entities operating under the same or similar name with the same or similar principal place of business.

31. For purposes of this Complaint, Defendants Diocese of Albany, Archdiocese of New York, and NDBGHS will be referred to collectively as "the Institutional Defendants."

32. At all times material, NDBGHS was under the authority of the Diocese of Albany.

33. At all times material, NDBGHS was under the control of the Diocese of Albany.

34. At all times material, NDBGHS was under the province of the Diocese of Albany.

35. At all times material, NDBGIIS was under the authority of the Bishop of the Diocese of Albany.

36. At all times material, NDBGHS was under the control of the Bishop of the Diocese of Albany.

37. At all times material, NDBGHS was under the province of the Bishop of the Diocese of Albany.

38. At all times material, the Diocese of Albany owned NDBGHS.

39. At all times material, the Diocese of Albany operated NDBGHS.

40. At all times material, the Diocese of Albany managed NDBGHS.

41. At all times material, the Diocese of Albany maintained NDBGHS.

42. At all times material, the Diocese of Albany controlled NDBGHS.

43. At all times material, Defendant James Vincent Hanney a/k/a James A. Hanney (“Defendant Hanney”) was an adult male resident of the State of New York.

44. Defendants Does 1 through 5 are unknown agents whose identities will be provided when they become known pursuant to C.P.L.R. § 1024.

JURISDICTION

45. This Court has jurisdiction because the Institutional Defendants’ principal places of business are in New York.

46. This Court has jurisdiction because the unlawful conduct complained of herein occurred in New York.

47. Venue is proper because Albany County is the principal place of business of Defendant Diocese of Albany.

48. Venue is proper because many of the events giving rise to this action occurred in Albany County.

FACTS

49. At all times material, Defendant Brother James Vincent Hanney, C.F.C. was a Roman Catholic brother employed by Institutional Defendants and All Hallows Institute.

50. At all times material, Defendant Hanney remained under the supervision of the Institutional Defendants and All Hallows Institute.

51. At all times material, Defendant Hanney remained under the employ of the Institutional Defendants and All Hallows Institute.

52. At all times material, Defendant Hanney remained under the control of the Institutional Defendants and All Hallows Institute.

53. At all times material, All Hallows Institute was under the authority of the Archdiocese of New York.

54. At all times material, All Hallows Institute was under the control of the Archdiocese of New York.

55. At all times material, All Hallows Institute was under the province of the Archdiocese of New York.

56. At all times material, All Hallows Institute was under the authority of the Archbishop of the Archdiocese of New York.

57. At all times material, All Hallows Institute was under the control of the Archbishop of the Archdiocese of New York.

58. At all times material, All Hallows Institute was under the province of the Archbishop of the Archdiocese of New York.

59. At all times material, the Archdiocese of New York owned All Hallows Institute.
60. At all times material, the Archdiocese of New York operated All Hallows Institute
61. At all times material, the Archdiocese of New York managed All Hallows Institute.
62. At all times material, the Archdiocese of New York maintained All Hallows Institute.
63. At all times material, the Archdiocese of New York controlled All Hallows Institute.
64. The Institutional Defendants and All Hallows Institute placed Defendant Hanney in positions where he had access to and worked with children as a part of his work.
65. Plaintiff was a student at NDBGHS in Schenectady, New York in the Diocese of Albany.
66. Plaintiff and Plaintiff's family came in contact with Defendant Hanney as an agent and representative of the Institutional Defendants, and at NDBGHS.
67. Plaintiff participated in school, youth, and/or church activities at NDBGHS.
68. Each Defendant had custody of Plaintiff.
69. Each Defendant accepted the entrustment of Plaintiff.
70. Each Defendant had responsibility for Plaintiff.
71. Each Defendant had authority over Plaintiff.
72. From approximately 1977 to 1982, when Plaintiff was approximately 15 to 20 years old, Defendant Hanney engaged in unpermitted sexual contact with Plaintiff.
73. After Defendant Hanney began working at All Hallows Institute in the Bronx, New York, within the Archdiocese of New York, in approximately 1978, Defendant Hanney engaged in unpermitted sexual contact with Plaintiff at All Hallows Institute.

74. Each Institutional Defendant owed a duty of care to Plaintiff not to place Defendant Hanney in a setting that would foreseeably pose a danger to Plaintiff.

75. The Institutional Defendants knew or should have known that Defendant Hanney was a danger to children before Defendant Hanney sexually assaulted Plaintiff.

76. Prior to the sexual abuse of Plaintiff, the Institutional Defendants knew or should have known that Defendant Hanney was not fit to work with children.

77. The Institutional Defendants, by and through their agents, servants and/or employees, knew or should have known of Defendant Hanney's propensity to commit sexual abuse and of the risk to Plaintiff's safety.

78. The Institutional Defendants knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions within the Diocese of Albany and/or Archdiocese of New York were safe.

79. The Institutional Defendants knew or should have known that there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese of Albany and/or Archdiocese of New York.

80. The Institutional Defendants knew or should have known that they did not have sufficient information about whether or not there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese of Albany and/or Archdiocese of New York.

81. The Institutional Defendants knew or should have known that the Institutional Defendants had numerous agents who had sexually molested children.

82. The Institutional Defendants knew or should have known that child molesters have a high rate of recidivism.

83. The Institutional Defendants knew or should have known that some of the leaders and people working in Catholic institutions within the Diocese of Albany and/or Archdiocese of New York were not safe and that there was a danger of child sex abuse for children participating in their youth programs.

84. The Institutional Defendants negligently deemed that Defendant Hanney was fit to work with children.

85. The Institutional Defendants negligently deemed that any previous problems that Defendant Hanney had were fixed or cured.

86. The Institutional Defendants negligently deemed that Defendant Hanney would not sexually assault children and/or that Defendant Hanney would not injure children.

87. The Institutional Defendants owed Plaintiff a duty of reasonable care because they had superior knowledge about the risk that Defendant Hanney posed to Plaintiff, the risk of abuse in general in their programs and/or the risks that their facilities posed to minor children.

88. The Institutional Defendants owed a duty to Plaintiff to protect Plaintiff from harm because The Institutional Defendants' actions created a foreseeable risk of harm to Plaintiff.

89. As a vulnerable child participating in the programs and activities the Institutional Defendants offered to minors, Plaintiff was a foreseeable victim.

90. As a vulnerable child who Defendant Hanney had access to through the Institutional Defendants' facilities and programs, Plaintiff was a foreseeable victim.

91. The Institutional Defendants also breached their duty to Plaintiff by actively maintaining and employing Defendant Hanney in a position of power and authority through which Defendant Hanney had access to children, including Plaintiff, and power and control over children, including Plaintiff.

92. Each Institutional Defendant breached its duties to Plaintiff. The Institutional Defendants failed to use ordinary care in determining whether their facilities were safe and/or determining whether they had sufficient information to represent their facilities as safe. The Institutional Defendants' breach of their duties include, but are not limited to: failure to protect Plaintiff from a known danger, failure to have sufficient policies and procedures to prevent child sex abuse, failure to properly implement policies and procedures to prevent child sex abuse, failure to take reasonable measures to make sure that policies and procedures to prevent child sex abuse were working, failure to adequately inform families and children of the risks of child sex abuse, failure to investigate risks of child sex abuse, failure to properly train the employees at institutions and programs within the Institutional Defendants' geographical confines, failure to train parishioners within the Institutional Defendants' geographical confines about the risk of sexual abuse; failure to have any outside agency test their safety procedures, failure to protect the children in their programs from child sex abuse, failure to adhere to the applicable standard of care for child safety, failure to investigate the amount and type of information necessary to represent the institutions, programs, leaders and people as safe, failure to train their employees properly to identify signs of child sexual abuse by fellow employees, failure by relying upon mental health professionals, and/or failure by relying on people who claimed that they could treat child molesters.

93. The Institutional Defendants also breached their duty to Plaintiff by failing to warn Plaintiff and Plaintiff's family of the risk that Defendant Hanney posed and the risks of child sexual abuse in Catholic institutions.

94. The Institutional Defendants also failed to warn Plaintiff or Plaintiff's family about any of the knowledge that the Institutional Defendants had about child sexual abuse.

95. The Institutional Defendants additionally violated a legal duty by failing to report known and/or suspected abuse of children by Defendant Hanney and/or its other agents to the police and law enforcement.

96. As a direct and proximate result of the Defendants' conduct described herein, Plaintiff has suffered, and will continue to suffer, sexual and physical damage and abuse, great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, physical, personal and psychological injuries. Plaintiff was prevented, and will continue to be prevented, from performing normal daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for psychological treatment, therapy, and counseling, and, on information and belief has and/or will incur loss of income and/or loss of earning capacity.

97. The limitations of Article 16 of the CPLR do not apply because one or more of the exceptions set forth in CPLR 1601 and/or 1602 apply.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST DEFENDANT HANNEY IN
SEXUAL BATTERY**

98. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

99. In and around 1977 to 1982, Defendant Hanney intentionally inflicted unpermitted, harmful, and offensive bodily, sexual contact upon the person of Plaintiff.

100. Plaintiff did not consent to the harmful bodily contact.

101. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

102. As a result of the foregoing, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION AGAINST THE INSTITUTIONAL
DEFENDANTS IN PREMISES LIABILITY**

103. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

104. Each Institutional Defendant owed Plaintiff a duty to protect Plaintiff from harm because the Institutional Defendants invited Plaintiff onto their property.

105. Defendant Hanney posed a dangerous condition on the Institutional Defendants' property.

106. Each Institutional Defendant allowed Defendant Hanney to remain on the Institutional Defendant's property even though it knew or should have known of Defendant Hanney's dangerous sexual propensities.

107. Defendant Hanney was dangerous, unsafe, and posed a risk of serious injury to any persons who were lawfully in and about said area.

108. Each Institutional Defendant knew or should have known of the danger posed by Defendant Hanney and despite said notice, each Institutional Defendant failed, refused, and/or neglected to remove, reassign, or restrict Defendant Hanney's access to children, and was otherwise careless and negligent such that a great risk of serious injury to persons who are lawfully in and about said area was caused and/or allowed to exist.

109. Each Institutional Defendant knew or should have known that Defendant Hanney posed an unreasonable risk of harm and a foreseeable danger to Plaintiff.

110. The Institutional Defendants knew or should have known that Defendant Hanney was a danger to children before Defendant Hanney sexually assaulted Plaintiff.

111. The Institutional Defendants knew or should have known that Defendant Hanney was not fit to work with children and had a propensity to engage in conduct with children that was sexual in nature before Defendant Hanney sexually assaulted Plaintiff.

112. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

113. As a result of the foregoing, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A THIRD CAUSE OF ACTION AGAINST THE INSTITUTIONAL
DEFENDANTS IN NEGLIGENCE**

114. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

115. Each Institutional Defendant voluntarily undertook to control, care for, and/or supervise Plaintiff.

116. Each Institutional Defendant owed Plaintiff a duty of reasonable care to protect the Plaintiff from injury.

117. Each Institutional Defendant breached its duties to Plaintiff by failing to use reasonable care. The Institutional Defendants' failures include, but are not limited to, failing to properly supervise Defendant Hanney, failing to properly supervise Plaintiff, and failing to protect Plaintiff from a known danger.

118. The Institutional Defendants knew or should have known that Defendant Hanney was a danger to children before Defendant Hanney sexually assaulted Plaintiff.

119. The Institutional Defendants knew or should have known that Defendant Hanney was not fit to work with children and had a propensity to engage in conduct with children that was sexual in nature before Defendant Hanney sexually assaulted Plaintiff.

120. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

121. As a result of the foregoing, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION AGAINST THE INSTITUTIONAL DEFENDANTS IN NEGLIGENT SUPERVISION OF ITS EMPLOYEES AND ENTITIES

122. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

123. At all times material, Defendant Hanney was employed by the Institutional Defendants and was under the Institutional Defendants' direct supervision, employ, and control when he committed the wrongful acts alleged herein.

124. Defendant Hanney engaged in the wrongful conduct while acting in the course and scope of his employment with the Institutional Defendants and/or accomplished the sexual abuse by virtue of his job-created authority.

125. The Institutional Defendants had a duty to ensure that Defendant Hanney did not sexually molest children.

126. The Institutional Defendants had a duty to train and educate employees and administrators and establish adequate and effective policies and procedures calculated to detect, prevent, and address inappropriate behavior and conduct between clerics and children.

127. The Institutional Defendants were negligent in the training, supervision, and instruction of their employees.

128. The Institutional Defendants failed to timely and properly educate, train, supervise, and/or monitor their agents or employees with regard to policies and procedures that should be followed when sexual abuse of a child is suspected or observed.

129. The Institutional Defendants were additionally negligent in failing to supervise, monitor, chaperone, and/or investigate Defendant Hanney and/or in failing to create, institute, and/or enforce rules, policies, procedures, and/or regulations to prevent Defendant Hanney's sexual abuse of Plaintiff.

130. In failing to properly supervise Defendant Hanney, and in failing to establish such training procedures for employees and administrators, the Institutional Defendants failed to exercise the care that a reasonably prudent person or entity would have exercised under similar circumstances.

131. The Institutional Defendants knew or should have known that Defendant Hanney was a danger to children before Defendant Hanney sexually assaulted Plaintiff.

132. The Institutional Defendants knew or should have known that Defendant Hanney was not fit to work with children and had a propensity to engage in conduct with children that was sexual in nature before Defendant Hanney sexually assaulted Plaintiff.

133. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

134. As a result of the foregoing, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A FIFTH CAUSE OF ACTION AGAINST THE INSTITUTIONAL
DEFENDANTS IN NEGLIGENT RETENTION**

135. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

136. The Institutional Defendants knew or should have known of Defendant Hanney's propensity for child sexual abuse, and failed to take any further action to remedy the problem and failed to investigate or remove Defendant Hanney from working with children.

137. The Institutional Defendants negligently retained Defendant Hanney with knowledge of Defendant Hanney's propensity for the type of behavior which resulted in Plaintiff's injuries in this action.

138. The Institutional Defendants negligently retained Defendant Hanney in a position where he had access to children and could foreseeably cause harm which Plaintiff would not have been subjected to had the Institutional Defendants acted reasonably.

139. In failing to timely remove Defendant Hanney from working with children, the Institutional Defendants failed to exercise the degree of care that a reasonably prudent person or entity would have exercised under similar circumstances.

140. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

141. As a result of the foregoing, Plaintiff claims to have been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SIXTH CAUSE OF ACTION AGAINST THE INSTITUTIONAL
DEFENDANTS IN NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

142. Plaintiff repeats and realleges each and every paragraph of this Complaint as if fully set forth at length herein.

143. Each Institutional Defendant owed a duty of care to Plaintiff not to place Defendant Hanney in a setting that would foreseeably pose a danger to Plaintiff.

144. The Institutional Defendants knew or should have known that Defendant Hanney was a danger to children before Defendant Hanney sexually assaulted Plaintiff.

145. The Institutional Defendants knew or should have known that Defendant Hanney had a propensity to engage in conduct with children that was sexual in nature before Defendant Hanney sexually assaulted Plaintiff.

146. Each Institutional Defendant breached its duties to Plaintiff by failing to use reasonable care. Each Institutional Defendant's failures include, but are not limited to, failing to properly supervise Defendant Hanney, failing to properly supervise Plaintiff and failing to protect Plaintiff from a known danger.

147. The negligence and conduct of each Institutional Defendant unreasonably endangered the physical safety of Plaintiff.

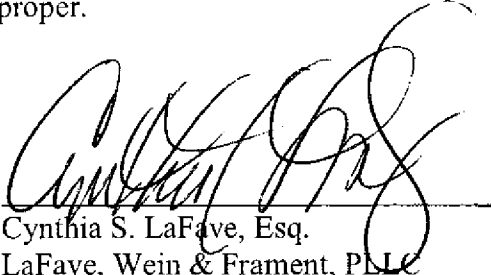
148. The aforementioned negligence of each Institutional Defendant was a direct and proximate cause of the extreme emotional and psychological harm and distress suffered by Plaintiff and unreasonably endangered Plaintiff's safety.

149. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering.

150. As a result of the foregoing, Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, on Plaintiff's First, Second, Third, Fourth, Fifth and Sixth Causes of Action in an amount which exceeds the jurisdictional limits of all lower Courts which would otherwise have jurisdiction, together with interest as allowed by statute, the costs and disbursements of this action, and such other and further relief as this Court deems just and proper.

Dated: August 14, 2019.
Guilderland, NY


by: Cynthia S. LaFave, Esq.
for: LaFave, Wein & Frament, PLLC
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